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FILED

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

2008 JUN -9 AM 10:15

CLERK US DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIABY Key DEPUTY

UNITED STATES OF AMERICA,

Plaintiff,

v.

Alberto FLORES-Ramos

Defendant.

Magistrate Case No. _____

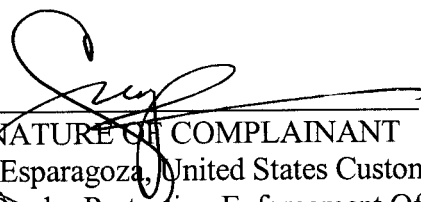
COMPLAINT FOR VIOLATION OFTitle 8, U.S.C., Section 1324(a)(2)(B)(iii)
Bringing in Illegal Alien(s)
Without Presentation

'08 MJ 1792

The undersigned complainant being duly sworn states:

On or about **June 8, 2008**, within the Southern District of California, defendant **Alberto FLORES-Ramos**, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, **Maribel CARRASCO-Lopez**, had not received prior official authorization to come to, enter and reside in the United States, did bring to the United States said alien, and upon arrival did not bring and present said alien immediately to an appropriate immigration officer at a designated port of entry; in violation of Title 8, United States Code, Section 1324(a)(2)(B)(iii).

And the complainant states that this complaint is based on the attached statement of facts, which is incorporated herein by reference.


 SIGNATURE OF COMPLAINANT
 Sara Esparagoza, United States Customs
 and Border Protection Enforcement Officer

SWORN TO BEFORE ME AND SUBSCRIBED IN MY PRESCENCE, THIS **9th** DAY OF
JUNE, 2008.


 UNITED STATES MAGISTRATE JUDGE

PROBABLE CAUSE STATEMENT

The complainant states that **Maribel CARRASCO-Lopez** is a citizen of a country other than the United States; that said alien has admitted she is deportable; that her testimony is material; that it is impracticable to secure her attendance at trial by subpoena; and that she is a material witness in relation to this criminal charge and should be held or admitted to bail pursuant to Title 18, United States Code, Section 3144.

On June 8, 2008 at approximately 7:15 AM, **Alberto FLORES-Ramos (Defendant)** made application for admission into the United States at the San Ysidro Port of Entry as the driver and sole visible occupant of a 2000 Dodge Ram. Defendant presented his valid Permanent Resident Alien Card bearing his name and photo as his entry document to a U.S. Customs and Border Protection (CBP) Officer. Defendant stated he was not bringing anything from Mexico and that he was traveling to his home in Los Angeles, California. Defendant further stated he was the registered owner of the vehicle and had traveled to Tijuana to have the rear seat of the vehicle re-upholstered.

The CBP Officer conducted an inspection of the rear seat, and was not able to lift the rear seat or release the back rest of the rear seat. Defendant stated he was unsure of how to lift the seat, that the seat was broken, and that he was going to return to Mexico at a later day to fix the seat. The CBP Officer reached underneath the rear seat, felt a shoe and what felt like a human leg. Defendant was questioned in regards to the shoes found behind the seat and he stated they were his shoes. The CBP Officer removed a shoe from behind the rear seat and noticed the shoe belonged to a woman or a child. The CBP Officer attempted to remove the seat but was unsuccessful and called for assistance. Defendant attempted to talk to the CBP Officer about the situation and attempted to make a phone call prior to being escorted to secondary. Defendant and vehicle were escorted to secondary for a more thorough inspection.

While being escorted to secondary inspection, Defendant stated to a CBP Officer that he could help remove a girl out of the vehicle. During secondary inspection, CBP Officers removed the rear seat and discovered a female human being concealed inside a modified space behind the rear seat. The individual was determined to be a citizen of Mexico without entitlements to enter the United States and is now identified as **Maribel CARRASCO-Lopez (Material Witness)**.

During a video recorded interview, Material Witness declared she is a citizen of Mexico without legal rights or documents to enter the United States. Material Witness stated she was going to pay \$2,000.00 USD to be smuggled into the United States. Material Witness stated she was going to San Ysidro, California to resume residency.